

REQUIRE

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EXECUTIVE SECTION.

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June 21, 2001

## By Hand

David Waddell Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243

Re: Petition of United Telephone Company to Change and Increase Certain Intrastate Rates and Charges So As to Permit it to Earn a Fair and Adequate Rate of Return on its Property Used and Useful in Furnishing Telephone Service to its Customers in Tennessee and to Adopt new and Realistic Depreciation Rates for Central Office Equipment.

Docket No. 01-00451

Dear Mr. Waddell:

Enclosed please find the original and thirteen (13) copies of AT&T's Petition to Intervene.

If you have questions, please call me.

Sincerely,

Tim Lamoureux

Encls.

cc: T.G Pappas

## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:

Petition of United Telephone Company to Change and Increase Certain Intrastate Rates and Charges So As to Permit it to Earn a Fair and Adequate Rate of Return on its Property Used and Useful in Furnishing Telephone Service to its Customers in Tennessee and to Adopt new and Realistic Depreciation Rates for Central Office Equipment.

Docket No. 01-00451

## PETITION FOR INTERVENTION OF AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

AT&T Communications of the South Central States, Inc., pursuant to T.C.A. §4-5-310, submits this Petition for intervention in this matter, seeking to participate as its interests may appear, and, in support of its Petition, states that:

- 1. AT&T Communications of the South Central States, Inc. ("AT&T") is a Delaware corporation, authorized to do business in Tennessee, holding certificates of public convenience and necessity to operate in Tennessee intrastate commerce as both an interexchange carrier and as a competing telecommunications service provider.
- 2. AT&T has paid, and continues to pay, access charges to United Telephone Company.

- 3. The legal rights, duties and other legal interests of AT&T will be determined in this proceeding. The interests of justice and the orderly and prompt conduct of the proceedings in the manner required by law will not be impaired by allowing the intervention of AT&T, as its interests may appear. United Telephone Company remains under the general regulatory jurisdiction of this Authority.
- 4. Pursuant to T.C.A. § 65-4-104, the TRA has general supervisory authority and regulatory power, jurisdiction, and control over all public utilities, including United Telphone Company. TCA §§65-5-201 and 65-5-203 confer upon the Authority jurisdiction over the rates, charges, classifications and tariffs of United Telephone Company. Pursuant to T.C.A. §§65-4-115, 65-4-122, and 65-5-204, United Telephone Company is prohibited from imposing any unreasonable, unjust, or unduly preferential or discriminatory practice, rates, or charges.

WHEREFORE, the premises considered, AT&T prays that:

1. Its Petition for intervention be granted, and it be allowed to participate in this proceeding as its interest may appear, and to receive copies of all filings, notices and orders.

2. It have such other, further and general relief as the justice of its cause may entitle it to receive.

This 21st day of June, 2001.

James P. Lamoureux, Esq

AT&T

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Attorneys for AT&T Communications of the South Central States, Inc.